

REMARKS

Applicants reply to the Final Office Action dated February 20, 2008 within two months. Thus, Applicants request an Advisory Action, if necessary. Claims 1-12 were pending in the application and the Examiner rejects claims 1-12. Applicants add new dependent claim 13. Support for the new claim and amendments may be found in the originally filed specification, claims, and figures. No new matter has been introduced by this new claim and these amendments. Applicants assert that the application is in condition for allowance and reconsideration of the pending claims is requested.

Rejections Under 35 U.S.C. § 103

The Examiner rejects claims 1, 3, and 8 under 35 U.S.C. § 103(a) as being unpatentable over Pickering, U.S. Patent No. 5,483,445 in view of Haseltine et al., U.S. Patent No. 6,578,015 ("Haseltine"), Remington, U.S. Patent No. 6,070,150, Stinson et al., U.S. Patent No. 6,045,039 ("Stinson"), and in further view of Pollin, U.S. Patent No. 5,504,677 ("Pollin"). Applicants respectfully traverse the rejection.

Pickering generally discloses an automated system for consolidating a number of individual and reoccurring charges such that the system may issue payment to the various payees of the reoccurring charges, while allowing the consumer to facilitate a single payment. The system receives information relating to the various payees from the consumer. The system further receives information from the identified payees relating to statement due dates. When all such information is received, the system calculates an optimal payment due date for the consumer. Pickering discloses that an optimal payment due date may result in some payees being paid early, while others are paid later. An Administrator of the Pickering system negotiates with the payees to determine an acceptable surcharge to be paid to those payees that are paid later than the typical statement due date. The surcharge is based on a company's loss of interest because of the later than expected payment date as well as any additional processing expenses that the payee may incur.

Haseltine generally discloses a third-party system for billing consumers on behalf of a number of individual payees. Specifically, the Haseltine system accepts statement specific information from each participating payee in order to create a billing statement template. The template is subsequently used by the system to generate billing statements that may be presented to consumers for review and payment. The Haseltine system further allows payers to access an

online system to view specific information relating to, for example, payment history and a summary of charges, fees, and taxes. Payees may interact with the system to define specific terms relating to billing statements and payments.

Remington generally discloses a bill presentment and payment remittance system using the Internet. Specifically, the Remington system enables an organization to interact with the system to configure billing parameters such as, for example, what information to include within a bill, predefined customer dispute reasons, change of address fields, etc. Remington seeks to eliminate the problems associated with other billing systems, which force the payee to modify existing accounting systems in accordance with the format of payment remittance as defined by the prior art billing systems. The payee is in complete control of how the bill is formatted and presented, and how the remittance is formatted such that the payee of Remington can more seamlessly integrate the billing system with existing computing systems and databases.

Stinson generally discloses a biometric Automated Teller Machine (ATM), wherein a traditional debit or credit card is not required to perform banking functions, including receiving cash from an account. More specifically, the Stinson ATM allows a user to enter a Personal Identification Number (PIN) at an ATM, which causes one or more mounted digital cameras to sample the user's face. The PIN and one or more sampled facial images are transmitted over a network to an authorization server where the PIN is used to retrieve corresponding stored facial images from a database. The sampled facial images are compared with the stored facial images to determine whether they match. If they match, a message is sent to a banking system to indicate that the identity of the ATM user has been confirmed. The banking system then verifies that an available account balance or line of credit is sufficient for the requested currency amount. The banking system sends an authorization signal to the ATM to dispense the requested currency amount. Stinson further discloses the use of other biometric inputs such as, for example, finger prints and iris scans.

Pollin generally discloses a system that enables collection agencies and the like to accept checking account information from of a payer and generate drafts without requiring a signature of the payer. The Pollin system accepts account information and verifies it against a bank information database to ensure that any discrepancies in bank information can be rectified during a conversation between a collections agent and a collections representative. The Pollin system may further generate an inquiry to a bank identified by the payee to ensure that a substantial

balance of funds is available to finalize the transaction. When all verification is complete, the Pollin system generates a paper bank draft payable to the payee such that it can be processed as an ordinary check.

While each of the cited references disclose billing and payment systems, any combination of the cited references would not produce a system that would enable processing of payments **for different types of accounts** (e.g., banking, credit and brokerage), such that modification to existing legacy systems would not be required. Those of ordinary skill in the art would appreciate that many large financial institutions employ legacy systems to manage accounts by processing account statements and received payments. At a minimum, replacing these legacy systems would be very expensive. Such an endeavor could lead to disrupted services and lost revenues. These problems are magnified for financial institutions that offer very different types of accounts (e.g., banking, credit, and brokerage). **In those circumstances, payments are normally processed through separate business units, using separate computing systems, and separate databases. However, none of the cited references, either alone or combined, would enable such payments to be received and processed by a unified processing system, without the need to modify many different systems.** As such, neither Pickering, Haseltine, Remington, Stinson, Pollin, nor any combination thereof, disclose or contemplate the unique combination of the following steps as recited by independent claim 1.

- a request processor coupled to a remittance manager, an arrangement manager, a financial institution validator, a financial transaction manager, a check writing manager, and an electronic payment manager
- said remittance manager is configured to process incoming bank payments to a banking service to format said incoming bank payments and validate said incoming bank payments according to internal rules and external rules applicable to said banking service
- said arrangement manager is configured to receive banking requests for at least one of: periodic and requested movement of funds for said banking service
- said financial institution validator is configured to validate banking data regarding external institutions relating to said banking service
- said financial transaction manager is configured to perform banking instructions related to various financial transactions for said banking service, wherein said banking instructions include said formatted bank payments, said periodic and requested movement of funds, and said validated banking data regarding external institutions and, wherein said financial transaction manager receives said banking instructions in a format that is usable by an existing financial system of a bank
- said check writing manager is configured to generate a print request to print a bank check and to maintain bank account information to validate a requested bank check amount against an available bank account balance at said banking service

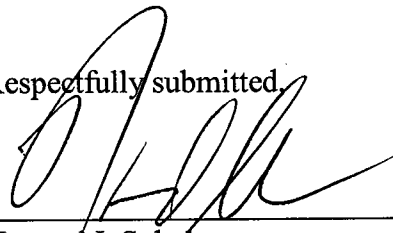
- said electronic payment manager is configured to process outgoing electronic payments from said banking service
- said remittance manager is configured to process incoming credit line payments to a credit service to format said incoming credit line payments and validate said incoming credit line payments according to internal rules and external rules relating to said credit service
- said arrangement manager is configured to receive credit requests for at least one of: periodic and requested movement of funds for said credit service
- said financial institution validator is configured to validate credit data regarding external institutions relating to said credit service
- said financial transaction manager is configured to perform credit instructions related to various financial transactions for said credit service, wherein said credit instructions include said formatted credit line payments, said periodic and requested movement of funds, and said validated credit data regarding external institutions and, wherein said financial transaction manager receives said credit instructions in a format that is usable by an existing financial system of a said credit service
- said check writing manager is configured to generate a print request to print a check against a line of credit of said credit service and to maintain credit account information to validate a requested check amount against an available balance of said line of credit at said credit service;
- said electronic payment manager is configured to process outgoing electronic payments from said credit service
- said remittance manager is configured to process incoming brokerage account payments to a brokerage service to format said incoming brokerage account payments and validate said incoming brokerage account payments according to internal rules and external rules relating to said brokerage service
- said arrangement manager is configured to receive brokerage requests for at least one of: periodic and requested movement of funds for said brokerage service
- said financial institution validator is configured to validate brokerage account data regarding external institutions relating to said brokerage service
- said financial transaction manager is configured to perform brokerage account instructions related to various financial transactions for said brokerage service, wherein said brokerage account instructions include said formatted brokerage account payments, said periodic and requested movement of brokerage account funds, and said validated brokerage account data regarding external institutions and, wherein said financial transaction manager receives said brokerage account instructions in a format that is usable by an existing financial system of a said brokerage service
- said check writing manager is configured to generate a print request to print a check against a brokerage account of said brokerage service and to maintain brokerage account information to validate a requested check amount against an available balance of said brokerage account at said brokerage service
- said electronic payment manager is configured to process outgoing electronic payments from said brokerage service

Dependent claims 2-12 depend from independent claim 1. Therefore dependent claims 2-12 are differentiated from the cited reference for at least the same reasons as set forth above, as well as in view of their own respective features.

New dependent claim 13 also depends from independent claim 1. Therefore dependent claim 13 is differentiated from the cited reference for at least the same reasons as set forth above, as well as in view of its own respective features. Moreover, support for dependent claim 13 may be found in, for example, U.S. Patent Application 10/378,465, of which the instant application incorporates by reference.

Applicants respectfully submit that the pending claims are in condition for allowance. The Commissioner is hereby authorized to charge any fees, which may be required, or credit any overpayment, to Deposit Account No. 19-2814 **for which purpose a duplicate copy of this sheet is attached.** **This statement does NOT authorize charge of the issue fee.** Applicants invite the Examiner to telephone the undersigned if the Examiner has any questions regarding this Reply or the present application in general.

Respectfully submitted,



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By: _____
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